

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UBIQUITI NETWORKS, INC.,

*Plaintiff,*

v.

CAMBIUM NETWORKS, INC.;  
CAMBIUM NETWORKS, LTD.;  
BLIP NETWORKS, LLC;  
WINNCOM TECHNOLOGIES, INC.;  
SAKID AHMED; and DMITRY  
MOISEEV,

*Defendants.*

Civil Action No.: 1:18-cv-05369

**JURY TRIAL DEMANDED**

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 26.2 and the Agreed Confidentiality Order entered in this case (Dkt. #102), Defendants Cambium Networks, Inc. ("Cambium") and Cambium Networks, Ltd. ("Cambium UK"), Blip Networks, LLC, Winncom Technologies, Inc., Sakid Ahmed, and Dmitry Moiseev (collectively the "Defendants"), respectfully request the Court to grant Defendants' Motion for Leave to File Under Seal (the "Motion") Exhibit G to Defendants' Motion to Stay Discovery.<sup>1</sup> In support of the Motion, Defendants state as follows:

1. WHEREAS, Plaintiff served Answers to Defendants' First set of Interrogatories on Defendants on March 3, 2020. Those responses were not designated as confidential under the

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<sup>1</sup> The Second Amended General Order In Re: Coronavirus COVID-19 Public Emergency (Dkt. No. 117) suspends through May 1, 2020 Local Rule 5.3(b), which pertains to noticing motions for presentment. Local Rule 26, which would typically require noticing a motion to file under seal (such as the instant motion) is an extension of Local Rule 5.3(b) and is therefore also suspended under the Court's COVID-19 Orders. Defendants therefore file this motion without an accompanying notice of presentment.

protective order.

2. WHEREAS, Plaintiff indicated by e-mail of March 12, 2020 that it had “neglected to apply the proper confidentiality markings on the discovery responses” and requested that Defendants “treat the discovery responses as AEO.”

3. WHEREAS, Plaintiff served updated Answers to Defendants’ First set of Interrogatories on Defendants on March 13, 2020, which were designated “CONFIDENTIAL RESTRICTED – ATTORNEYS’ EYES ONLY.”

WHEREFORE, for the foregoing reasons, Defendants respectfully request that the Court grant leave to file the above document under seal.

Dated: April 25, 2020	<p>Respectfully submitted,</p> <p>BAKER BOTTS L.L.P.</p> <p><u>/s/ G. Hopkins Guy, III</u></p> <p>One of their attorneys</p> <p>G. Hopkins Guy III (CA Bar No. 124811) hop.guy@bakerbotts.com Jon V. Swenson (CA Bar No. 233054) jon.swenson@bakerbotts.com Karina Smith (CA Bar No. 286680) karina.smith@bakerbotts.com BAKER BOTTS L.L.P. 1001 Page Mill Road Building One, Suite 200 Palo Alto, CA 94304-1007 650.739.7500 (Phone) 650.739.7699 (Facsimile)</p> <p>Andrew D. Wilson (DC Bar No. 1030144) 700 K Street, N.W. Washington, DC 20001-5692 202.639.1312 (Phone) 202.508.9336 (Fax)</p>
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	<p>andrew.wilson@bakerbotts.com</p> <p>Arthur J. Gollwitzer (06225038) agollwitzer@michaelbest.com James P. Fieweger (6206915) jpfieweger@michaelbest.com MICHAEL BEST &amp; FRIEDRICH, LLP 444 West Lake Street, Suite 3200 Chicago, Illinois 60606 312.222.0800 (Phone)</p> <p><i>Attorneys for Defendants Cambium Networks, Inc. et al.</i></p>
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2020, I electronically filed the foregoing **DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL** with the Clerk of the Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users.

/s/ G. Hopkins Guy, III